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Attorneys for Defendants

UNIVERSAL UNDERWRITERS INSURANCE

COMPANY and UNIVERSAL

UNDERWRITERS SERVICE CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ADELA G. ALVAREZ, an individual

Plaintiff,

v.

UNIVERSAL UNDERWRITERS INSURANCE  
COMPANY, a business entity form unknown,  
UNIVERSAL UNDERWRITERS SERVICE  
CORPORATION, a corporation and DOES 1  
through 20, inclusive,

Defendants.

CASE NO.

**NOTICE OF REMOVAL OF ACTION  
TO FEDERAL COURT PURSUANT TO  
28 U.S.C. SECTION 1441(b)  
(DIVERSITY); JURY DEMAND;  
CERTIFICATE OF INTERESTED  
PARTIES**

Action Filed: September 17, 2014  
Trial Date: None Set

**TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA:**

PLEASE TAKE NOTICE THAT Defendants UNIVERSAL UNDERWRITERS  
INSURANCE COMPANY and UNIVERSAL UNDERWRITERS SERVICE CORPORATION  
(hereinafter, collectively, "Universal"), by and through their undersigned attorneys of record,  
hereby remove to this Court the state court action described below.

**JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction of this action under 28 U.S.C. section  
1332, and is one which may be removed to this Court by Universal pursuant to the provisions of  
28 U.S.C. section 1441(b) in that it is a civil action between citizens or subjects of a foreign state

2. Venue is proper in the Northern District of California pursuant to 28 U.S.C. sections 1391(b) and (c), because Plaintiff is subject to personal jurisdiction in this judicial district and a substantial part of the events giving rise to this lawsuit occurred in this division of the Northern District of California.

3. On September 17, 2014, Plaintiff Adela G. Alvarez (“Plaintiff”), by and through her attorney Daniel E. Griffee, commenced a civil action in the Superior Court of the State of California in and for the County of Monterey against Universal, entitled *ADELA G. ALVAREZ v. UNIVERSAL UNDERWRITERS INSURANCE COMPANY, a business entity form unknown, UNIVERSAL UNDERWRITERS SERVICE CORPORATION, a corporation and DOES 1 through 20, inclusive*, Monterey County Superior Court Case No. M129256. A true and correct copy of the complaint is attached as **Exhibit A**.

5. The basis for removal is that Plaintiff is a citizen and resident of the State of California while Defendant Universal Underwriters Insurance Company is a corporation organized and existing under the laws of the State of Missouri in the United States of America, and Defendant Universal Underwriters Service Corporation is a corporation organized and existing under the laws of the State of Missouri in the United States of America. This Court therefore has original jurisdiction of this action under 28 U.S.C. section 1332 because each Universal entity is a citizen or subject of a separate foreign state and Plaintiff is a citizen of the State of California.

6. Plaintiff's Complaint alleges that she is entitled to recover a jury verdict in an undetermined amount, but includes a prayer for general damages, special damages, punitive damages, and attorneys' fees. Thus, Universal believes in good faith that the amount in controversy may exceed \$75,000, as required for removal pursuant to 49 U.S.C. section 11706.

**DEMAND FOR JURY TRIAL**

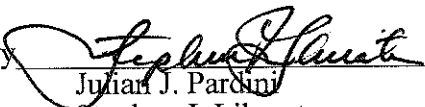
7. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Defendants Universal hereby demand a trial by jury.

Wherefore, Defendant Nationwide prays that this action be removed to this Court.

Dated: October 23, 2014

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

By   
Julian J. Pardini  
Stephen J. Liberatore  
Attorneys for Defendants  
UNIVERSAL UNDERWRITERS INSURANCE  
COMPANY and UNIVERSAL UNDERWRITERS  
SERVICE CORPORATION

**CERTIFICATE OF INTERESTED PARTIES**

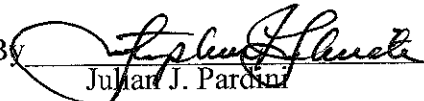
Pursuant to Federal Rules of Civil Procedure, Rule 7.1, and Northern District of California Local Rules, Civil L.R. 3-15, the undersigned certifies that as of this date, the following non-parties have an interest in the outcome of this case:

1. There are no known interested parties other than Plaintiffs and Defendant.

Dated: October 23, 2013

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

By   
Julian J. Pardini  
Stephen J. Liberatore  
Attorneys for Defendants  
UNIVERSAL UNDERWRITERS INSURANCE  
COMPANY and UNIVERSAL UNDERWRITERS  
SERVICE CORPORATION